

FILED

Case 1:07-cv-07267

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FEBRUARY 8, 2008

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

DEC 27 2007 *aw*
Dec 27 2007
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

GREGORY CHAMPION

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

07CV7267

JUDGE PALLMEYER

MAG. JUDGE VALDEZ

vs.

COOK County Sheriff Thomas BART

EXECUTIVE Director Godinez

(Supplied by the Clerk of this Court)

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

X

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

I. Plaintiff(s):

- A. Name: GREGORY CHAMPION
- B. List all aliases: _____
- C. Prisoner identification number: 20060080031
- D. Place of present confinement: COOK COUNTY JAIL
- E. Address: 2700 S. CALIFORNIA

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: THOMAS ART
- Title: SHERIFF
- Place of Employment: COOK COUNTY
- B. Defendant: GODINEZ
- Title: EXECUTIVE GODINEZ
- Place of Employment: COOK COUNTY JAIL
- C. Defendant: _____
- Title: _____
- Place of Employment: _____

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. Exhaustion of Administrative Remedies

You are required to exhaust all your available administrative remedies before bringing an action in federal court.

A. Is there a grievance procedure available at your institution?

YES (☒) NO () If there is no grievance procedure, skip to F.

B. Have you filed a grievance concerning the facts in this complaint?

YES (☒) NO (☒)

C. If your answer is YES:

1. What steps did you take?

I filed grievance pertaining to the fact that Lloyd King was not put in the "hole", and I have not been allowed to press charges against him.

2. What was the result?

No response yet from "Sheriff's Police".

3. If the grievance was not resolved to your satisfaction, did you appeal? What was the result (if there was no procedure for appeal, so state.)

D. If your answer is NO, explain why not:

NO GRIEVANCE NECESSARY!!

- E. Is the grievance procedure now completed? YES () ~~NO ()~~
- F. If there is no grievance procedure in the institution, did you complain to authorities? YES (X) NO ()

G. If your answer is YES:

1. What steps did you take?

Floyd King was given 29 days in the hole!!

TRANSFERED Floyd King TO ANOTHER LIVING

UNIT. I WAS TAKEN TO DISPENSARY & GIVEN PAIN
My glasses will not be replaced!! Killers

2. What was the result?

I have not been allowed to press charges.

H. If your answer is NO, explain why not:

IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: CHAMPION v. DAHLQUIST ET AL
07C 1373
- B. Approximate date of filing lawsuit: 2/20/07
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: _____

- D. List all defendants: CPP Delia #20736, Root #16311, Superintendent
Clive, CHGO. Police Department, City of CHICAGO

- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern DISTRICT EASTERN DIVISION
- F. Name of judge to whom case was assigned: CASTILLO
- G. Basic claim made: Ave Process v.10, false Arrest.
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Pending
- I. Approximate date of disposition: _____

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

V. Statement of Claim:

State here as briefly as possible the facts of your case. Describe precisely how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

① On 12/04/07, circa 2:00 p.m., detainee Floyd King punched plaintiff Champion in the face, over his right eye, while plaintiff Champion was lying on bed reading legal materials. Champion's right eye socket was healing from previous fracture!!

② Cook County Sheriff Thomas Dart^{E Director Godinez,} acting under color of state law, failed to provide plaintiff Champion safety from dangerous felon, who has been to prison several times violating Champion's 14th amendment liberty clause^{E due process clause}, which asserts that detainees cannot be violated of 14th Constitution rights to safe housing, free of vicious attacks.

③ Floyd King is dangerous felon, should not have been housed in minimum security tier with Champion. His bed was right next to Champion's in dormitory setting.

④ Plaintiff Champion's 8th Amendment rights were violated, which prohibit deliberate indifference to Minimum security status of Medical tier

Prison 2, Room 2 N-House, by allowing in Floyd King, who is maximum security, lifelong, dangerous habitual criminal, having been in County jail over 8 times, spanning 20 years. Plaintiff Champion also alleges cruel & unusual punishment.

5. Plaintiff Champion's 14th amendment Due Process Clause rights also were violated due to Thomas Dort's ^{Director Godinez} inability to protect Champion from serious violent episode, while Champion was in state custody, ^{Director Godinez} Dort, & officers under his ^{their} supervision acting at all times under color of state law. Because no charges have been pursued by "Sheriff Police", may ^{14th amendment due process rights have been violated, as well as equal protection of the laws.} each defendant

Relief

I want federal court to award me \$200,000.00 for physical injuries, constitutional violations, and pain & emotional suffering, from both defendants.

Certification

By signing this complaint, I certify that the facts stated in this complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the court.

Signed this 4 day of December, 2007 Gregory Champion

GREGORY CHAMPION

20060080031

1419 Woodhollow Ln

Flossmoor IL 60422

VI. Relief:

Dear District Court.

8:30 p.m.

07C1373

07C6070

07C6414

My name is GREGORY CHAMPION, and I am a detainee in Cook County Jail. On 12/04/07, detainee Floyd King walked over to my bed & punched me in right eye, breaking my glasses. He was removed from my living unit immediately.

Two days later, he went to an administrative hearing & moved out of the entire building, Dorm 2.

I have been trying to file assault charges against him, however something is "going" on here at jail. No one will come interview me & proceed with the filing of charges. Now I just found out he is not even in the "hole". He was moved to dorm 1, & he has been heard to say he is coming back to dorm 2, maybe even back to my living unit, N-House. I am filing Federal lawsuit against Thomas Dart, Cook County Sheriff, & I want this letter on the record, that

charges have not been filed against him, ^{Floyd KING} jail is acting very protectionary of "Floyd King". He is very dangerous felon & I am afraid of him, & his gang!! I want to file charges for Assault.

Very Sincerely Greg. Champion

20060080031

P.O. Box 089002

Chgo. Il. 60608

Division 2

Room 2

N-House